

Maine Readiness Sustainment	)	Departmental
Maintenance Center	)	Findings of Fact and Order
Aroostook County	)	Air Emission License
Limestone, Maine	)	After-The-Fact
A-844-71-A-N	)	

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

## I. REGISTRATION

### A. Introduction

Maine Readiness Sustainment Maintenance Center (Maine Readiness) of Limestone, Maine has applied for an air emission license permitting the operation of emission sources associated with their vehicle rebuilding facility.

### B. Emission Equipment

Maine Readiness is authorized to operate the following air emission units:

#### Fuel Burning Equipment

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>	<b>Fuel Type</b>	<b>Maximum Firing Rate (gallons/hr)</b>	<b>Stack</b>
Boiler 7230B	4.8	#2, 0.35%	34.5	1
Boiler 7500B	8.0	#2, 0.35%	57.1	2
Boiler 7501B1	1.8	#2, 0.35%	12.6	4
Boiler 7501B2	1.25	#2, 0.35%	8.9	12
Boiler 8260B	3.7	#2, 0.35%	26.5	5
Boiler 8712B	6.1	#2, 0.35%	43.5	7
Boiler 8713B1	3.4	#2, 0.35%	24.5	8
Boiler 8713B2	3.1	#2, 0.35%	22.1	9
Boiler 8716B	3.7	#2, 0.35%	26.5	11

In addition to the units listed above Maine Readiness owns and operates three waste oil fired furnaces that have a maximum heat input capacity of less than 1 MMBtu/hour.

### Process Equipment

<u>Unit</u>	<u>Control Equipment</u>
7500PB1 Paint Booth	Fiber Filters
7500PB2 Paint Booth	Fiber Filters
7501PB Paint Booth	Fiber Filters
7500BB1 Blast Booth	Multiclones
7500BB2 Blast Booth	Multiclones
7500PGC(4) Paint Gun Cleaner	none
7500 SK(3) Degreaser	none
7501 PGC(2) Paint Gun Cleaner	none
8260 SK(5) Degreaser	none
8713 SK(3) Degreaser	none

#### C. Application Classification

The new source is considered a major source based on whether or not expected emissions exceed the “Significant Emission Levels” as given in Maine’s Air Regulations. The emission for the new source are determined by the maximum future license allowed emissions, as follows:

<u>Pollutant</u>	<u>Max. Future License (TPY)</u>	<u>Sig. Level</u>
PM	8.4	100
PM <sub>10</sub>	8.4	100
SO <sub>2</sub>	37.0	100
NO <sub>x</sub>	42.0	100
CO	3.8	100
VOC	30.2	50

This source is determined to be a minor new source and has been processed as such.

## II. BEST PRACTICAL TREATMENT (BPT)

#### A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control

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requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT) as defined in Chapter 100 of the Air Regulations. BACT is a top down approach to selecting air emission controls considering economic, environmental and energy impacts.

#### B. Boilers

The boilers at Maine Readiness each have a heat input capacity less than 10.0 MMBtu/hr and are therefore not subject to EPA's New Source Performance Standards, 40 CFR Part 60, Subpart Dc.

BACT for the boilers is the following:

- Use of 0.35% sulfur #2 fuel.
- SO<sub>2</sub> emission rates when firing #2 fuel oil are based on all of the sulfur in the fuel converting to SO<sub>2</sub> (mass balance).
- PM, PM<sub>10</sub>, emission rates are based on BACT of 0.08 lb/MMBtu.
- NO<sub>x</sub>, CO and VOC emission rates are based on AP-42 dated 9/98 for boilers less than 100 MMBtu/hr firing #2 fuel oil.
- Visible emissions from the stacks serving the boilers shall not exceed an opacity of 20 percent on a six (6) minute block average basis.

#### C. Surface Preparation

Maine Readiness operates Blast Booth 7500BB1 and 7500BB2. Emissions from these booths is particulate matter and is controlled by multiclones, which is BACT.

Visible emissions from the stacks serving the Blast Booths shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

#### D. Surface Coating

Maine Readiness operates Paint Booth 7500PB1, 7500PB2 and 7501PB. Per MEDEP Chapter 129, Section (1)(E)(3), Maine Readiness is exempt from the requirements of Chapter 129. In order to meet BACT for VOCs, Maine Readiness shall be limited to process VOC emissions of 25.0 tons/year and shall utilize HVLP spray guns as well as fiber filters on the booth.

Maine Readiness shall keep a 12 month rolling total for VOC emissions based on purchase records and MSDS (material safety data sheets) records for the various materials used in the facility.

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Some of the VOCs emitted by Maine Readiness contain HAPs ("HAPs"- Hazardous Air Pollutants - means those substances listed in Section 112(b) of the Clean Air Act). In order to keep HAP emissions insignificant, Maine Readiness shall be limited to emissions of 7.5 ton/year total of combined HAPs. Maine Readiness shall keep a 12 month rolling total for each HAP emitted and total facility HAPs emitted based on purchase records and MSDS (material safety data sheets) records for the various materials used in the facility.

Visible emissions from the stacks serving the Paint Booths shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

**E. Paint Gun Cleaners**

Maine Readiness maintains 6 Paint Gun Cleaners. BACT for these units is to: keep records of the amount of solvent added to, and waste solvent removed from, each cleaner, equip each cleaner with a cover, close the covers on both cleaners when they are not in use, drain the cleaned parts for at least fifteen (15) seconds or until dripping stops, and refrain from operating the cleaners upon the occurrence of any visible solvent leak until such leak is repaired.

**F. Degreasers**

Maine Readiness maintains 11 Safety Kleen degreasers. BACT for these degreasers is the requirements of MEDEP Chapter 130.

**G. Facility Emissions and Fuel Use Caps**

Maine Readiness is limited to the use of 1,500,000 gallons of #2 fuel oil (0.35% S by weight) and 25 tons of VOCs from processes (all based on a 12 month rolling total).

**Total Annual Emissions for the Facility**  
(used to calculate the annual license fee)

<b><u>Pollutant</u></b>	<b><u>Boilers</u></b>	<b><u>Surface Coating</u></b>	<b><u>Paint Gun Cleaners</u></b>	<b><u>Degreasers</u></b>	<b><u>Total TPY</u></b>
PM	8.4	-	-	-	<b>8.4</b>
PM <sub>10</sub>	8.4	-	-	-	<b>8.4</b>
SO <sub>2</sub>	37.0	-	-	-	<b>37.0</b>
NO <sub>x</sub>	42.0	-	-	-	<b>42.0</b>
CO	3.8	-	-	-	<b>3.8</b>
VOC	0.2	25.0	2.0	3.0	<b>30.2</b>
Total HAP	-	7.5	-	-	<b>7.5</b>

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### **III. AIR QUALITY ANALYSIS**

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a non-major new source shall be determined on a case-by-case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

### **ORDER**

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-844-71-A-N, subject to the following conditions :

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive

dust, and shall submit a description of the program to the Department upon request.

- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege.
- (7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
- (8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a license or amendment shall not stay any condition of the license.
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
  - a. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
    1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
    2. pursuant to any other requirement of this license to perform stack testing.

- b. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - c. submit a written report to the Department within thirty (30) days from date of test completion.
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
  - a. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
  - b. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
  - c. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (13) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.

- (15) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(16) **Licensed fuel burning equipment emission limits:**

A. Emissions from Boiler 7230B shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.38
PM <sub>10</sub>	n/a	0.38
SO <sub>2</sub>	n/a	1.69
NO <sub>x</sub>	n/a	1.92
CO	n/a	0.17
VOC	n/a	0.01

B. Emissions from Boiler 7500B shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.64
PM <sub>10</sub>	n/a	0.64
SO <sub>2</sub>	n/a	2.82
NO <sub>x</sub>	n/a	3.2
CO	n/a	0.29
VOC	n/a	0.01

C. Emissions from Boiler 7501B1 shall not exceed the following:

<u>Pollutant</u>	<u>lb/hr</u>
PM	0.14
PM <sub>10</sub>	0.14
SO <sub>2</sub>	0.63
NO <sub>x</sub>	0.72
CO	0.06
VOC	0.01



D. Emissions from Boiler 7501B2 shall not exceed the following:

<u>Pollutant</u>	<u>lb/hr</u>
PM	0.10
PM <sub>10</sub>	0.10
SO <sub>2</sub>	0.44
NO <sub>x</sub>	0.50
CO	0.04
VOC	0.01

E. Emissions from Boiler 8260B shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.30
PM <sub>10</sub>	n/a	0.30
SO <sub>2</sub>	n/a	1.30
NO <sub>x</sub>	n/a	1.48
CO	n/a	0.13
VOC	n/a	0.01

F. Emissions from Boiler 8712B shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.49
PM <sub>10</sub>	n/a	0.49
SO <sub>2</sub>	n/a	2.15
NO <sub>x</sub>	n/a	2.44
CO	n/a	0.22
VOC	n/a	0.01

G. Emissions from Boiler 8713B1 shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.27
PM <sub>10</sub>	n/a	0.27
SO <sub>2</sub>	n/a	1.20
NO <sub>x</sub>	n/a	1.36
CO	n/a	0.12
VOC	n/a	0.01

H. Emissions from Boiler 8713B2 shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.25
PM <sub>10</sub>	n/a	0.25
SO <sub>2</sub>	n/a	1.09
NO <sub>x</sub>	n/a	1.24
CO	n/a	0.11
VOC	n/a	0.01

I. Emissions from Boiler 8716B shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.08	0.30
PM <sub>10</sub>	n/a	0.30
SO <sub>2</sub>	n/a	1.30
NO <sub>x</sub>	n/a	1.48
CO	n/a	0.13
VOC	n/a	0.01

J. Maine Readiness is limited to the use of 1,500,000 gallons/year of #2 fuel oil, based on a 12 month rolling total. The sulfur content of the #2 fuel oil shall not exceed 0.35%. Compliance shall be demonstrated using fuel use records maintained on a 12-month rolling total and the records shall include fuel percent sulfur.

K. Visible emissions from the stacks serving the boilers (Stacks 1, 2, 4, 5, 7, 8, 9, 11 and 12) each shall not exceed an opacity of 20 percent on a six (6) minute block average basis.

(17) **Surface Preparation**

- A. Maine Readiness shall operate the dust collection devices for the Blast Booths at all times when the corresponding process equipment is in use.
- B. Visible emissions from the stacks serving the Blast Booths shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

(18) **Surface Coating Operations**

- A. Maine Readiness shall use fiber filters and high volume, low-pressure (HVLP) spray guns in the Paint Booths.

- B. Maine Readiness shall not exceed a VOC emission limit of 25.0 tons per year (based on a 12-month rolling total) from surface coating operations. Compliance with the VOC ton per year limit shall be demonstrated by monthly mass balance calculations using purchase records and the VOC content of the material as found on the MSDS sheets or by a Method 24 test sample or other means approved by the DEP. Maine Readiness shall maintain monthly records on the premises to document the name and identification of each coating and the mass of VOC per volume of each coating used on each coating unit, line or operation.
- C. HAP emissions from Maine Readiness shall not exceed a facility wide limit of 7.5 ton per year of total HAPs (12 month rolling total). Compliance with the HAP ton per year limit shall be demonstrated by monthly mass balance calculations using purchase records and the HAP content of the material as found on the MSDS sheets or by other means approved by the DEP. Maine Readiness shall maintain monthly records on the premises to document the name and identification of each coating and the mass of HAP per volume of each coating used on each coating unit, line or operation.
- D. Visible emissions from the stacks serving the Paint Booths shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

(19) **Paint Gun Cleaners**

For the Paint Gun Cleaners, Maine Readiness shall:

- A. Keep records of the amount of solvent added to each cleaner,
- B. Equip each cleaner with a cover,
- C. Close the covers on both cleaners when they are not in use,
- D. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops,
- E. Refrain from operating the cleaners upon the occurrence of any visible solvent leak until such leak is repaired.
- F. VOC emissions from the Paint Gun Cleaners shall not exceed 2.0 tons per year (based on a 12-month rolling total).

(20) **Solvent Degreasing**

The parts washers are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

- A. Maine Readiness shall keep records of the amount of solvent added to each parts washer.
- B. Maine Readiness shall attach a permanent conspicuous label to each unit summarizing the following operational standards of Chapter 130:

1. Equip each cold cleaning degreaser with a cover that is easily operated with one hand if:
    - a.the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
    - b.the solvent is agitated; or,
    - c.the solvent is heated.
  2. Close the covers on all solvent degreasing tanks when the tanks are not in use;
  3. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
  4. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
  5. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
  6. Minimize drafts to less than 40 meters/minute;
  7. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired; and
  8. Do not use any halogenated solvents in the degreasing tanks.
- C. Total VOC emissions from solvent degreasing shall not exceed 3.0 tons per year (based on a 12-month rolling total).

(21) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report by September 1, to the Department, the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
- or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017  
Phone: (207) 287-2437

- (22) Maine Readiness shall pay the annual air emission license fee within 30 days of **June 30th** of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.

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(23) The term of this order shall be for five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: January 9, 2003

Date of application acceptance: March 6, 2003

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Mark Roberts, Bureau of Air Quality.